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April 1, 2019

VIA EMAIL ludmer.margo@epa.gov

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Re: Canadian Radium and Uranium Site

Dear Margo:

Thank you for your email of Friday afternoon which we have had the opportunity to discuss with our client. Our clients are generally in agreement with the concept of paying for the additional costs associated with off hours work, but need more details both as to the cost and the proposed schedule before a final commitment can be made. Once my client has these details, they will confirm the time schedule with the tenant and then confirm the arrangements with your office.

The tenant's location closes at 6:00 p.m. on Saturday and is open from 11:00 a.m. to 6:00 p.m. on Sunday. While we do not know your client's contractors mobilization needs and work schedule, we suggest the following and invite your comments:

1. The air canisters be placed in the building any time after 6:00 p.m. Saturday evening when the service, sales and customers have left the building and ready access can be provided.
2. The performance of the radiological survey can occur Saturday evening starting at 6:30 p.m. after the employees and customers have removed their cars from the parking lot.
3. Soil sampling can commence in the parking lot on Saturday evening and our clients are prepared to pay for lights to allow the work to continue into the evening. As the four samples proposed for the parking lot interfere the most with the tenant's activities, these four should occur on

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Saturday evening and if necessary, be completed
Sunday morning.

4. The two samples to be taken in the street side of the building can be collected Sunday morning before 11:00 a.m. such that the parking of the drill rig and the work movements of the contractors will not interfere with the tenant's customers and employees.
5. The three samples to be collected along the southern side of the building and the one sample to be collected on the track side of the building can be collected Sunday afternoon and extend into Monday if necessary.

We recognize this is an aggressive schedule, but suggest the performance of work during the evening hours on Saturday and all day Sunday (with the four samples in the parking lot to be collected as the first task for the drilling) should reasonably allow for this goal to be met.

While we understand EPA's reluctance to allow nighttime work, it is common practice to do nighttime work and the area can be lit in a manner to allow it to be safely performed. Performance of the work during the evening is arguably safer as there will not be customers and employees parking and driving onto the lot and the lot will have fewer vehicles parked on it as the employees will not have parked their cars on the lot overnight.

Please review this proposed schedule with your client and advise. Thank you.

Very truly yours,



Nicholas M. Ward-Willis

NMW/sj

cc: Andrew Cannistra, CPA
Victor Cannistra, CPA
Joel Sachs, Esq